

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JASON ALERS and KEVIN CRAWFORD,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

PENNSYLVANIA HIGHER EDUCATION
ASSISTANCE AGENCY d/b/a AMERICAN
EDUCATION SERVICES and FEDLOAN
SERVICING, PERFORMANT RECOVERY,
INC, TRANSWORLD SYSTEMS, INC., and
ACCOUNT CONTROL TECHNOLOGY, INC.

Defendants.

Civil Action No. 2:20-cv-02073

CLASS ACTION

**MOTION OF DEFENDANT
ACCOUNT CONTROL TECHNOLOGY, INC.
TO DISMISS PLAINTIFFS' CLASS ACTION COMPLAINT**

Defendant Account Control Technology, Inc. ("ACT"), hereby moves to dismiss Plaintiffs' Class Action Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). In support thereof, ACT incorporates herein by reference the accompanying memorandum of law and the arguments made in the memorandums of law submitted by the Pennsylvania Higher Education Assistance Agency in support of its Motions to Dismiss. A proposed form of Order is attached.

/s/ Bridget C. Giroud

William T. Mandia (Pa. I.D. No.
91792)

Bridget C. Giroud (Pa. I.D. No.
321289)

Matthew B. Johnson (admitted *pro*
hac vice)

STRADLEY RONON STEVENS &
YOUNG, LLP

2005 Market Street

Suite 2600

Philadelphia, PA 19103-7018

(215) 564-8000

Attorneys for Defendant

Account Control Technology, Inc

Dated: July 3, 2020